

2017 MAY 18 PM 3:19  
FBI - NEW YORK  
272

**BRODIE, J.**

MMS:BAS  
F.# 2017R00899

**SCANLON, M.J.**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

KEITH ROBINSON,

Defendant.

INDICTMENT

**CR** No. 17

**272**

(T. 18, U.S.C., §§ 922(g)(1),  
924(a)(2), 924(d)(1) and 3551 et  
seq.; T. 21, U.S.C., § 853(p); T. 28,  
U.S.C., § 2461(c))

----- X

THE GRAND JURY CHARGES:

FELON IN POSSESSION OF A FIREARM

1. On or about April 30, 2017, within the Eastern District of New York, the defendant KEITH ROBINSON, having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a Taurus model PT 709 Slim 9mm pistol, and ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violations of Title 18, United States Code, Section 922 or Section 924, including but

not limited to one Taurus model PT 709 Slim 9mm pistol, and ammunition, recovered from the defendant in Staten Island, New York, on or about April 30, 2017.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

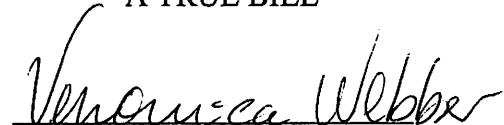
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

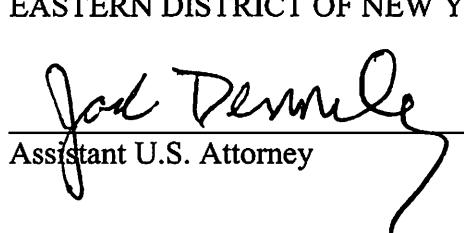
(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
Veronica Webber  
FOREPERSON

BRIDGET M. RHODE  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

By:

  
Bridget M. Rhode  
Assistant U.S. Attorney

F. #2017R00899  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

KEITH ROBINSON,

Defendant.

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**INDICTMENT**

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2), 924(d)(1) and 3551 *et seq.*;  
T. 21, U.S.C. § 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*

*Veronica Webster*  *Foreperson*

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

*Clerk*

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*Bail, \$* \_\_\_\_\_

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*Benjamin A. Saltzman, Special Assistant U.S. Attorney (718) 254-6097*